

## **PROCEDURE 2505-A**

All personnel must strictly observe the following standards relating to disposal of hardcopy and electronic copies of PHI:

PHI must not be discarded in trash bins, unsecured recycle bags or other publicly accessible locations. Instead, this information must be personally shredded or placed in a secured bag or box for delivery to the shredding service.

Printed material and electronic data containing PHI shall be disposed of in a manner that ensures confidentiality.

It is the individual's responsibility to ensure that the document has been secured or destroyed. It is the office manager and Privacy Officer/Designee's responsibility to ensure that all employees are adhering to the policy.

### **Destruction of Convenience Copies and Original Documents (Day-to-Day Destruction)**

1. NSMHA's Office Manager and/or Privacy Officer/Designee shall provide users with access to shredders for proper disposal of confidential printouts containing PHI.
2. If the amount to be shredded is extensive, a shredding service under contract and a Business Associate Agreement (BAA) may be utilized.

### **Electronic Copies**

Secure methods will be used to dispose of electronic data and output. NSMHA's IS/IT Specialist is responsible for the destruction of electronic copies containing PHI using the following methods:

1. Deleting on-line data using the appropriate utilities;
2. "Degaussing" computer tapes to prevent recovery of data;
3. Removing PHI from mainframe disk drives being sold or replaced, using the appropriate initialization utilities;
4. Erasing diskettes to be re-used using a special utility to prevent recovery of data; or
5. Destroying discarded diskettes.

### **Hardcopy (Bulk Destruction)**

1. Secure methods will be used to dispose of hardcopy data and output;
2. PHI printed material shall be shredded and recycled by a firm specializing in the disposal of confidential records or be shredded by an employee of the NSMHA to handle and personally shred the PHI;
3. Microfilm or microfiche must be cut into pieces or chemically destroyed;
4. After documents have reached their retention period, all PHI must be securely destroyed;
5. For PHI in paper records, shredding, burning, pulping, or pulverizing the records is required so that PHI is rendered essentially unreadable, indecipherable, and otherwise cannot be reconstructed. If hardcopy PHI (paper, microfilm, microfiche, etc.) cannot be shredded, it must be incinerated.

### **Documentation of Destruction**

1. To ensure that it is in fact performed, NSMHA personnel or a bonded destruction service must carry out the destruction of PHI.
2. If a bonded shredding company undertakes the destruction, the bonded shredding company must provide the NSMHA with documentation of destruction (which might take the form of an invoice for the service provided) that contains the following information:
  - a. Date of destruction;
  - b. Method of destruction; and
  - c. A statement that the records have been destroyed in the normal course of business.

### **Enforcement**

Office manager(s) and all workforce members are responsible for enforcing this policy. Individuals who violate this policy will be subject to disciplinary action.